

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

Lordstown Motors Corp., *et al.*,<sup>1</sup>

Debtor.

Chapter 11

Case No. 23-10831 (MFW)  
(Jointly Administered)

**CERTIFICATION OF COUNSEL REGARDING  
STIPULATION BETWEEN DEBTORS AND U.S. SECURITIES AND  
EXCHANGE COMMISSION TO EXTEND THE  
DEADLINE TO FILE CLAIMS**

The undersigned counsel to the above-captioned debtors and debtors-in-possession (the “**Debtors**”) hereby certifies as follows:

1. On August 24, 2023, the Court entered its *Order (A) Establishing Bar Dates and Related Procedures for Filing Proofs of Claim, Including Claims Arising Under Section 503(B)(9) of the Bankruptcy Code, (B) Approving the Form, Manner, and Procedures Of Notice Thereof, And (C) Granting Related Relief* [D.I. 319] (the “**Bar Date Order**”) setting a deadline, among other things, for governmental units to file a Proof of Claim against the Debtors of December 26, 2023 at 5:00 p.m. (the “**Governmental Bar Date**”)

2. In an effort to continue discussion amongst the parties regarding the claims that the U.S. Securities and Exchange Commission (the “**SEC**”) may hold against the Debtors, the SEC, the Official Committee of Unsecured Creditors (the “**UCC**”), and the Official Committee of Equity Security Holders (the “**EC**”) and the Debtors entered into the *Stipulation Between Debtors and U.S. Securities and Exchange Commission to Extend the Deadline for Filing Proofs of Claim*

---

<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

(the “**Stipulation**”) which extends the Governmental Bar Date solely for the SEC to December 29, 2023. Attached hereto as Exhibit A is a proposed order (the “**Proposed Order**”) approving the Stipulation. A copy of the Stipulation is attached to the Proposed Order as Exhibit 1.

WHEREFORE, the Debtors respectfully requests that the Court enter the Proposed Order approving the Stipulation at the Court’s earliest convenience.

*[Remainder of Page Intentionally Left Blank]*

Dated: December 22, 2023  
Wilmington, Delaware

<p><u>/s/ Morgan L. Patterson</u>  <b>WOMBLE BOND DICKINSON (US) LLP</b>  Donald J. Detweiler (DE Bar No. 3087)  Morgan L. Patterson (DE Bar No. 5388)  1313 North Market Street, Suite 1200  Wilmington, Delaware 19801  Telephone: (302) 252-4320  Facsimile: (302) 252-4330  don.detweiler@wbd-us.com  morgan.patterson@wbd-us.com</p> <p><i>Counsel to the Debtors and Debtors in Possession</i></p>	<p><b>WHITE &amp; CASE LLP</b>  Thomas E Lauria (admitted <i>pro hac vice</i>)  Matthew C. Brown (admitted <i>pro hac vice</i>)  Fan B. He (admitted <i>pro hac vice</i>)  200 South Biscayne Boulevard, Suite 4900  Miami, FL 33131  Telephone: (305) 371-2700  tlauria@whitecase.com  mbrown@whitecase.com  fhe@whitecase.com</p> <p>David M. Turetsky (admitted <i>pro hac vice</i>)  1221 Avenue of the Americas  New York, NY 10020  Telephone: (212) 819-8200  david.turetsky@whitecase.com</p> <p>Jason N. Zakia (admitted <i>pro hac vice</i>)  111 South Wacker Drive, Suite 5100  Chicago, IL 60606  Telephone: (312) 881-5400  jzakia@whitecase.com</p> <p>Roberto Kampfner (admitted <i>pro hac vice</i>)  Doah Kim (admitted <i>pro hac vice</i>)  RJ Szuba (admitted <i>pro hac vice</i>)  555 South Flower Street, Suite 2700  Los Angeles, CA 90071  Telephone: (213) 620-7700  rkampfner@whitecase.com  doah.kim@whitecase.com  rj.szuba@whitecase.com</p> <p><i>Counsel to Debtors and Debtors in Possession</i></p>
--	--